

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JIA SHENG,

Plaintiff,

v.

Civil No.: 12-Civ. 01103 (HBS)

**M&T BANK CORPORATION and
MANUFACTURERS AND TRADERS TRUST
COMPANY, d/b/a M&T BANK,**

DEFENDANTS' WITNESS LIST

Defendants.

DEFENDANTS' WITNESS LIST

Defendants, M&T Bank Corporation and Manufacturers and Traders Trust Company, d/b/a M&T Bank (collectively "M&T Bank" or the "Bank"), respectfully submit the following list of witnesses that they may call at the trial of this matter.

1. Dhana Hannibal (fact)
Williamsville, NY

Ms. Hannibal, Assistant Vice President and Senior Employee Relations Specialist at M&T Bank, will/is expected to testify about her interactions with Plaintiff including Plaintiff's request for an accommodation to her alternative work arrangement, the determination that her request could not be reasonably accommodated, and the various options that were made available to Plaintiff.

2. Monica K. Holcomb (fact)
Lancaster, NY

Ms. Holcomb, Vice President and Systems Manager I at M&T Bank, will/is expected to testify about her interactions with Plaintiff with regard to work-related matters and with regard to the changes being made to Plaintiff's alternative work arrangement. Ms. Holcomb will also

testify about the new initiative in their department that necessitated the change to Plaintiff's alternative work arrangement, and about the determination that Plaintiff's request could not be reasonably accommodated.

3. David R. Lee (fact)
Williamsville, NY

Mr. Lee, Vice President and Systems Manager II at M&T Bank, will/is expected to testify about the new initiative for M&T Bank that necessitated the change to alternative work arrangements – including Plaintiff's. Mr. Lee will also testify about the review of Plaintiff's request for an accommodation, the business needs related to the new initiative, and the determination that Plaintiff's request could not be reasonably accommodated.

4. Melissa Thompson (fact)
Buffalo, NY

Ms. Thompson, Vice President and Employee Relations Corporate Programs Manager at M&T Bank, will/is expected to testify about M&T Bank's policies with regard to employee requests for accommodations, and the review of and determination regarding Plaintiff's request. Ms. Thompson will also testify about M&T Bank's policies with regard to alternative work arrangements. She will also testify about the various options that were offered to Plaintiff, including the offer of severance.

5. John Walp, Jr. (fact)
Lockport, NY

Mr. Walp, Administrative Vice President and Corporate Information Security Officer, will/is expected to testify about M&T Bank's policies and procedures regarding the retention, collection, and production of electronic data, including emails, on M&T Bank's information systems.

DATE: August 9, 2017
Baltimore, MD

Respectfully submitted,



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Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of August 2017, a copy of Defendants'

Witness List was served via the Court's ECF system on:

Ariel Y. Graff
Robert W. Ottinger
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Counsel for Plaintiff



Justin C. Eller